

GDPR Privacy Notice  
General Data Protection Regulation (GDPR)  
Article 13 of Regulation EU 2016/679

1. Purpose of this notice

This Privacy Notice provides mandatory information as required under Articles 13 and 14 of the European General Data Protection Regulation (GDPR) regarding the transparency of personal data processing. Definitions of certain terms within this notice are explained in the appendix.

2. The Data Controller for personal data

reindeer (“We,” “us,” or “our”) will become a Data Controller if it collects personal data directly from a Data Subject. In these circumstances we will be acting under a ‘Legitimate Interest’ to legally process the data for providing Services for the Data Subject and to fulfil the contractual requirements for its Client. We also acts as a Data Controller for any personal data held regarding its own employees, and legally processes this data under its Contract of Employment with those Data Subjects.

3. Your Rights

As a Data Subject you have rights under the GDPR. These rights can be seen below. We will always fully respect your rights regarding the processing of your personal data, and has provided below the details of the person to contact if you have any concerns or questions regarding how we process your data, or if you wish to exercise any rights you have under the GDPR.

4. Contact Details

The identity and contact detail for the Data Protection Officer within reindeer is:

Shintaro Hara  
3-28-15 Sakura, Setagaya-ku  
Tokyo, Japan

5. Data Protection Principles

We have adopted the following principles to govern its collection and processing of Personal Data:

- A. Personal Data shall be processed lawfully, fairly, and in a transparent manner.
- B. The Personal Data collected will only be those specifically required to fulfil our service-relat-

ed requirements and/or communicate with you according to your requests. Such data may be collected directly from the Data Subject or provided to us via his /her employer. Such data will only be processed for that purpose.

- C. Personal Data shall only be retained for as long as it is required to fulfil contractual requirements, or to provide statistics to our Client Company.
- D. Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.
- E. The Data Subject has the right to request from us access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability. In each case such a request must be put in writing as in Section 3 above.
- F. The Data Subject has the right to make a complaint directly to a supervisory authority within their own country. reindeer's Data Protection compliance is supervised by:  
Shintaro Hara  
3-28-15 Sakura, Setagaya-ku  
Tokyo, Japan

#### Appendix – Definitions of certain terms referred to above:

##### Personal Data:

(Article 4 of the GDPR): 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

##### Processing:

(Article 4 of the GDPR): means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, erasure or destruction.

##### Legal Basis for Processing:

(Article 6 of the GDPR): At least one of these must apply whenever personal data is processed:

1. Consent: the individual has given clear consent for the processing of their personal data for a

specific purpose.

2. Contract: the processing is necessary for compliance with a contract.
3. Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary to perform a task in the public interest, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for the legitimate interests of the Data Controller unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Data Controller:

(Article 4 of the GDPR): this means the person or company that determines the purposes and the means of processing personal data.

Data Processor:

(Article 4 of the GDPR): means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

Data Subject Rights:

(Chapter 3 of the GDPR) each Data Subject has eight rights. These are:

1. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. The right of access; this is your right to see what data is held about you by a Data Controller.
3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.
4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

This Policy is effective as of May 1, 2018.

Last Updated: May 1, 2018.

Data protection officer : Shintaro Hara